

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KAREN GITAU,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	
)	NO.
LITTLE RIVER CAPITAL,)	
)	
Defendant.)	
)	JURY TRIAL DEMANDED
_____)	

NOTICE OF REMOVAL

COMES NOW LITTLE RIVER CAPITAL, LLC, Defendant, and pursuant to 28 U.S.C. §1441 and 28 U.S.C. §1446 files this Notice of Removal, and as grounds therefore shows as follows:

1. Plaintiff filed this action on January 19, 2021 in the Superior Court of Cobb County, State of Georgia.
2. This Notice is filed within 30 days of Defendant's receipt of the Complaint.
3. Plaintiff's Complaint, which is entitled "Racial Discrimination, Workplace Harassment & Retaliation Lawsuit" is brought under Title VII, 42 U.S.C. §2000e *et seq.*

4. In accordance with 28 U.S.C. §1446, concurrent with the filing of this Notice of Removal, Defendant is providing written notice of the Notice of Removal to Plaintiff and is filing a copy of this Notice with the Clerk of the Cobb County Superior Court.
5. This action is removable to federal court pursuant to 28 U.S.C. §1441 because it could have been filed originally in this Court pursuant to the federal question jurisdiction conferred by 28 U.S.C. §1331. Specifically, jurisdiction under 28 U.S.C. §1331 exists because a federal question appears “on the face of the plaintiff’s properly pleaded complaint.”
6. A copy of the Complaint and Summons is attached hereto as Exhibit “1”. No other process, pleadings or orders have been filed or served in this action.
7. All requirements for removal have been timely satisfied.

WHEREFORE, Defendant notices this Court of removal of this action and prays that the Court assume jurisdiction of this case.

Respectfully submitted,

/s/ E. Linwood Gunn, IV
E. Linwood Gunn, IV
Georgia Bar No. 315265
*Attorney for Defendant Little River
Capital LLC*

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CERTIFICATION UNDER L.R. 7.1D

Pursuant to Northern District of Georgia Local Rule 7.1.D, the undersigned counsel for Plaintiff hereby certifies that the above and foregoing pleading is a computer document prepared in Times New Roman (14 point) font in accordance with Local Rule 5.1B.

/s/ E. Linwood Gunn, IV

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Georgia State Bar No. 315265

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